

March 1, 2018

Ex Parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Promoting Investment in the 3550-3700 MHz Band, GN Docket No. 17-258; Amendment of the Commission's Rules with Regard to Commercial Operations in the 3550-3650 MHz Band, WT Docket No. 12-354; Revision of Part 15 of the Commission's Rules to Permit Unlicensed National Information Infrastructure (U-NII) Devices in the 5 GHz Band, ET Docket No. 13-49; Expanding Flexible Use in Mid-Band Spectrum Between 3.7 and 24 GHz, GN Docket No. 17-183.*

Dear Ms. Dortch,

On February 27, 2018, Tom Rutledge, Charter Communications, Inc.'s ("Charter") Chairman and Chief Executive Officer, and Craig Cowden, Senior Vice President, Wireless Technologies, met with Commissioner Michael O'Rielly and his Legal Advisor, Erin McGrath, regarding the above-captioned proceedings.

During the meeting, Mr. Rutledge articulated that the 3.5 GHz, 5.9 GHz, and Mid-Band spectrum bands are important components of Charter's emerging wireless strategy. Charter already provides wireless connectivity to over two hundred million wireless devices attached to its network via WiFi, carrying a majority of wireless traffic in the home and office. Through its "inside-out" deployment strategy, Charter is transitioning the wireless component of its network from a nomadic WiFi network to one that supports full mobility, incorporating WiFi with multiple 4G and 5G access technologies. Combining its advanced wireline network and innovative wireless technologies, Charter plans to deliver the next generation of broadband, including seamless ultra-fast low latency connectivity, to customers wherever they are – whether it's inside their homes and offices or outside when they are on the go.

Important to Charter's competitive entry into the mobility space is the Commission's efforts to make unlicensed spectrum available to providers and to create licensing rules that facilitate new entry.

Charter is already investing in robust trials to examine mobile and fixed wireless uses of the 3.5 GHz band (among others) in multiple markets throughout the country. Informed by testing results, Charter is excited about the potential to use fixed wireless technologies in the 3.5 GHz band to provide wireline-like broadband connectivity and speeds to areas beyond the reach of its wired network, including to those in underserved and unserved areas. Also, given this spectrum's propagation characteristics, Charter believes mobile uses of the CBRN band could combine well with WiFi, allowing a new entrant, like cable, to deploy 3.5 GHz spectrum quickly and cost effectively.

Mr. Rutledge emphasized that the 3.5 GHz band presents an important opportunity for the Commission to encourage new entry into the mobility space, increasing competition that will benefit consumers in terms of lower prices and more innovative services. To facilitate such new entry, the Commission should not establish license sizes so large that only the national carriers can bid. Smaller license areas would enable companies with smaller footprints to bid at auction and tailor their deployment plans to existing infrastructure, promoting investment confidence and enabling regional players to bring much faster wireless service to consumers across the country, including rural areas, in a shorter period of time.

To maximize the possibility for increased competition, encourage deployment and investment in rural areas as well as cities, and to promote efficient and broad use of the spectrum, the Commission should adopt a compromise between the census tracts espoused by some and the Partial Economic Areas espoused by the national carriers. Counties, for instance, are such an "in between" size and are the license size the Commission adopted for its upcoming 28 GHz band auction.

Mr. Rutledge also expressed support for the Commission to open 5.9 GHz spectrum for unlicensed use as soon as possible. Because of the 5.9 GHz band's size, location and capacity, opening it for unlicensed use would unleash rapid deployment of next-generation technologies. WiFi remains important to Charter, as it is foundational to the company's "inside-out" wireless deployment strategy to create seamless and ubiquitous connectivity for its customers. Mr. Rutledge articulated that allowing unlicensed use of the 5.9 GHz band would enable providers to

meet growing demand for faster WiFi and spur innovation in next-generation technologies like Gigabit WiFi.

Finally, the Charter executives expressed support for the Commission's review of mid-band spectrum for wireless broadband service, while also urging the Commission to ensure protection of existing services before making any changes to the spectrum allocations.

Respectfully submitted,

/s/ Elizabeth Andrion

Elizabeth Andrion
Senior Vice President
Regulatory Affairs

cc: Meeting attendees